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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)	MM Docket No. 98-198
)	
Amendment of Section 73.202(b))	RM-9690
Table of Allotments)	
FM Broadcast Stations)	
(Cross Plains, Texas))	
To: Chief, Allocations Branch		
Policy and Rules Division		
Mass Media Bureau		

COMMENTS ON FRITZ "SUPPLEMENT"

On August 13, 1999, Sonoma Media Corporation ("Sonoma") filed an Erratum to a "Motion to Withdraw and Dismiss Counterproposal" which it had filed on August 3, 1999. On August 26, 1999, an Opposition was filed by Jayson and Janice Fritz ("Fritz") and on September 3, 1999, a Reply to the Opposition was filed on behalf of Sonoma and Rawhide Radio LLC, its successor in this proceeding and as licensee of KVCQ, Cuero, Texas. On November 17, 1999, Fritz filed what it styled as a "Supplement" to its earlier pleading, and the instant Comments are directed by Sonoma/Rawhide (hereinafter "Rawhide") to that Supplement.

The gist of the Fritz Opposition was that, as an applicant for a new station in Mason, Texas, it did not 'like' the proposed replacement of channel 249C2 with equivalent channel 282C2 as proposed by Rawhide. Neither of the other two applicants for use of the Mason channel expressed any concern or objection to the proposed change. Perhaps aware that its objection as an applicant

to an equivalent change in a channel allocation carried no particular substantive weight, Fritz in its Opposition alluded to some alleged engineering defect in the proposed change, stating thus:

8. As set forth above, the Fritzes have learned of potential technical difficulties with the proposed substitution of Channel 282C2 at Mason ...[and have]... contacted their engineer, who is preparing a technical study of the matter ...[and]... Upon completion, the Fritzes will submit their engineer's findings on this matter. (Fritz Opposition at paragraph 8)

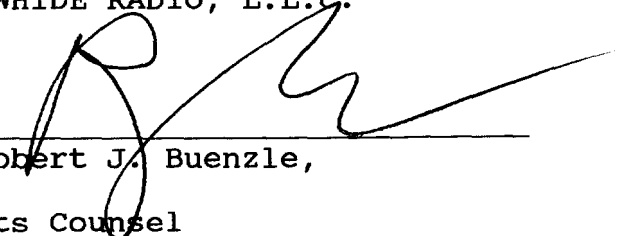
That would, of course, if true, have raised a substantive objection far beyond the 'we just don't like it' complaint included in the Opposition, and Rawhide, feeling confident in its engineering and its proposal, waited anxiously to see what those mysterious "technical difficulties" might be. That would prove to be a long wait. After almost 3 months from the time it first made the groundless charges, the Fritzes on November 17, 1999, filed their Supplement which, after recognizing that it had in its original Opposition "...indicated that it would submit engineering material to show that the substitute channel at Mason, Texas, proposed by Sonoma had technical difficulties", then went on to reveal that "The Fritzes have determined that they will **NOT** submit anything further at this time".(Fritz Supplement at page 2, emphasis supplied).

After having offered the original reckless and groundless accusations made in August, how nice of them to share that fact with us in November. The fact of the matter is that the Fritzes had nothing to say in August beyond the fact that 'as an

applicant, they just didn't like the equivalent channel change proposed by Rawhide', and they have nothing further to add to that now. That does not rise to a legitimate objection, no matter when it is offered.

Wherefore, Sonoma/Rawhide submits that the Opposition of the Fritzes has no substantive merit whatsoever and should be denied, and the Sonoma Motion to Dismiss Part of its Counterproposal granted.

Respectfully Submitted,
SONOMA MEDIA CORPORATION
RAWHIDE RADIO, L.L.C.

by 
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November 29, 1999

CERTIFICATE OF SERVICE

I, Robert J. Buenzle, do hereby certify that copies of the foregoing COMMENTS ON FRITZ SUPPLEMENT have been served by United States mail, postage prepaid this 29th day of November, 1999, upon the following:

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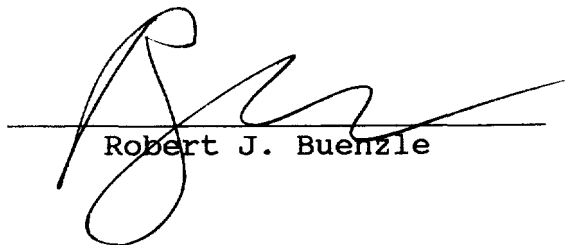
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